

THE CITY OF NEW YORK LAW DEPARTMENT

ZACHARY W. CARTER Corporation Counsel

100 CHURCH STREET NEW YORK, NY 10007 KAVIN THADANI Senior Counsel Phone: (212) 356-2351 Fax: (212) 356-3509 kthadani@law.nyc.gov

February 8, 2018

VIA HAND DELIVERY AND ECF

Honorable Ann Donnelly United States District Court Eastern District of New York 225 Cadman Plaza East Brooklyn, New York 11201

Re: Martinez v. City of New York, et al., 1:16-cv-00079-AMD-CLP

Your Honor:

I am a Senior Counsel in the office of Zachary W. Carter, Corporation Counsel of the City of New York, representing defendants City of New York, Jason Weitzman and Jason Forgione in the above-referenced matter. Please find enclosed, in connection with defendants' objections to the Magistrate Judge's Report and Recommendation, courtesy copies of the following:

- (1) Memorandum of Law in Supports of Defendants' Objections to the Magistrate Judge's Report and Recommendation Granting Plaintiff's Motion for Sanctions; and
- (2) Plaintiff's Reply to Defendants' Objections to the Report and Recommendation.

Thank you for your consideration in this regard.

Respectfully,

Kavin Thadani Senior Counsel

Special Federal Litigation

Encls.

cc: Magistrate Judge Cheryl L. Pollak (via mail w/o enclosures and ECF)

Baree Fett, Esq. (via e-mail w/o enclosures and ECF) Gabriel Harvis, Esq. (via e-mail w/o enclosures and ECF) Attorneys for Plaintiff